



# ATLAS TELEPHONE COMPANY, INC.

*Serving Big Cabin, Welch and Blue Jacket*

June 10, 2016

Barbara A. Summa  
President  
Atlas Telephone Company  
119 West Main Street  
Big Cabin, OK 74332-0077  
(918)783-5111

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

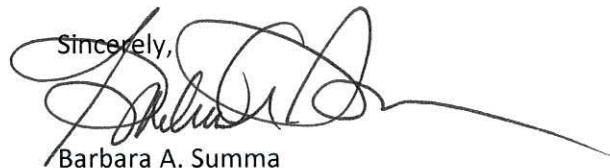
**RE: REQUEST FOR CONFIDENTIAL TREATMENT:**

Connect America Fund; High Cost Universal  
Service Support IN WC DOCKET NOS. 10-90, 07-  
135, 05-337, 03-109, CC DOCKET NOS. 01-92,  
96-45, GN DOCKET NO. 09-51, WT DOCKET NO.  
10-208, BEFORE THE FEDERAL  
COMMUNICATIONS COMMISSION

Dear Ms. Dortch:

Please find attached with this letter a request for confidential treatment for portions of information submitted with our company Form 481 along with four copies. Contemporaneously, we are filing a copy of the redacted Form 481, with redacted attachments, via ECFS. This information has also been filed with our state commission and electronically submitted, and certified, with the Universal Service Administration Company. If you have any questions or concerns with the attachments, please contact Charles Curtis at [Charles.curtis@contaegis.com](mailto:Charles.curtis@contaegis.com) or by phone at 252-514-2203.

Sincerely,



Barbara A. Summa

Cc: file

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
Connect America Fund	)	WC Docket No. 10-90
	)	WC Docket No. 07-135
High-Cost Universal Service Support	)	WC Docket No. 11-42
	)	WC Docket No. 05-337
Lifeline and Link Up Reform	)	WC Docket No. 03-109
	)	CC Docket No. 01-92
	)	CC Docket No. 96-45
	)	GN Docket No. 09-51
	)	WT Docket No. 10-208

**REQUEST FOR CONFIDENTIAL TREATMENT**

Atlas Telephone Company ("Filer") requests that the portions of its Form 481 pertaining to its Five Year Plan in the Service Quality Improvement Reporting, its Tribal Land Offerings documentation and its Rate of Return Additional Documentation (RUS Annual Report) be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. Sections 0.457, 0.459, and related provisions of the Freedom of Information Act ("FOIA"), including 5 U.S.C. Section 552(b)(4) ("Exemption 4"). Form 481 contains information regarding the Filer's capital expenditure budgets, detailed network information, corporate affiliations, strategic service offerings with Tribal Governments as well as sensitive financial information filed in the Rate of Return Documentation. Release of such information would supply its competition sensitive commercial information that would undermine its ability to serve its customers effectively. Such information is not customarily disclosed to the public or made available within the telecommunications industry. Therefore, the Filer requests confidentiality of these respective portions of its Form 481 filing be granted. Support for the Filer's request for confidential treatment pursuant to FCC rules in Section 0.459(b) is provided as follows:

**I. FILER'S FORM 481 SATISFY THE REQUIREMENTS OF SECTION 0.459 OF THE COMMISSION'S RULES**

The material the Filer seeks confidentiality qualifies for the requirements outlined in Section 0.459 of the FCC's rules. As will be demonstrated, the Filer has satisfied all the elements of this section, concluding that disclosure of this information would be harmful to the Filer.

**(1) Identification of the specific information for which confidential treatment is sought.**

The Filer requests confidential treatment for the portions of the Form 481 required by 47 C.F.R. Section 54.313(a)(2) and (4). The Form bears the legend "CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO.'S 10-90, 07-135, 05-337, 03-109, CC DOCKETS 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATION COMMISSION." The specific information considered confidential include: 1) The Filer's 5 year capital budget and network information associated with Service Quality Improvement Reporting (100), 2) Tribal Land Offerings documentation (900) and 3) ROR Additional Documentation which represents financial reports for calendar year 2015 (3005).

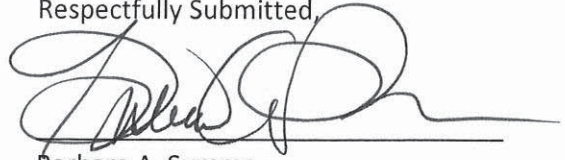


- (2) **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.** The information is required to be produced annually in accordance with 47 C.F.R. Section 54.313(a). The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42.
- (3) **Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.** The information requested for confidential treatment is information not customarily released to the public. Release of this information would have the effect of substantial harm to the competitive position of the Filer.
- (4) **Explanation of the degree to which the information concerns a service that is subject to competition.** All of the services provided by the Filer are subject to competition.
- (5) **Explanation of how disclosure of the information could result in substantial competitive harm.** Identification of network details could enable wrongdoers the ability to compromise network reliability to customers. In addition, competitive entities in the Filer's area would have access to sensitive network, strategic and financial details that would hamper the Filer's ability to effectively compete.
- (6) **Identification of any measures taken by the submitting party to prevent unauthorized disclosure.** The information filed is not customarily released to the public or publically made available within the telecommunications industry. The information is also only released within internal circulation, including its attorneys, consultants and engineers, held to confidentiality agreements. The request as well as the associated documents subject to it, are filed both paper copy as well as electronically.
- (7) **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.** None of the information requesting confidential treatment is available to the public and have not been disclosed to parties unless those parties are engaged to perform services for the Filer, under non-disclosure.
- (8) **Justification of the period during which the submitting party asserts that material should not be available for public disclosure.** Due to the fact that the nature of the information being filed is sensitive in terms of competitive and public safety concerns, the Filer requests that confidential treatment be granted indefinitely.

## II. CONCLUSION

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's rules, the Filer requests that the portions of Form 481 relating to those particular items listed in I.1, above, be treated as confidential under the Commission's rules and precedent and withheld from public inspection and that any distribution of them within the Commission should be limited, in accordance with the reasons stated for confidential request. In the case where any person, party or entity wishes to access any of this information, the Filer requests immediate notification so it can have the opportunity to oppose the request or consider any other action it deems necessary to protect both its network, strategic and financial interests and the interest of the customers it continues to serve.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Barbara A. Summa', written over a horizontal line.

Barbara A. Summa

President

Atlas Telephone Company

119 West Main Street

Big Cabin, OK 74332-0077

(918)783-5111

June 10, 2016

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 431966

<015> Study Area Name ATLAS TEL CO

<020> Program Year 2017



***REDACTED-FOR PUBLIC INSPECTION***

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code

431966

<015> Study Area Name

ATLAS TEL CO

2017



**REDACTED-FOR PUBLIC INSPECTION**

(200) Service Outage Reporting (Voice)  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code

431966

<015> Study Area Name

ATLAS TEL CO

<020> Program Year

2017



REDACTED-FOR PUBLIC INSPECTION

(300) Unfulfilled Service Request  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code  
<015> Study Area Name  
<020> Program Year

431966

ATLAS TEL CO

2017



**REDACTED-FOR PUBLIC INSPECTION**



(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code 431966

<015> Study Area Name ATLAS TEL CO

<020> Program Year 2017



**REDACTED-FOR PUBLIC INSPECTION**

<010>

Study Area Code

431966

<015>

Study Area Name

ATLAS TEL CO

2017



**REDACTED-FOR PUBLIC INSPECTION**

<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



**REDACTED-FOR PUBLIC INSPECTION**

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code

431966

<015> Study Area Name

ATLAS TEL CO

<020> Program Year

2017



**REDACTED-FOR PUBLIC INSPECTION**

(710) Broadband Price Offerings Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



**REDACTED-FOR PUBLIC INSPECTION**



(800) Operating Companies Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



**REDACTED-FOR PUBLIC INSPECTION**

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code  
<015> Study Area Name  
<020> Program Year

431966  
ATLAS TEL CO  
2017



REDACTED-FOR PUBLIC INSPECTION

(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code  
<015> Study Area Name

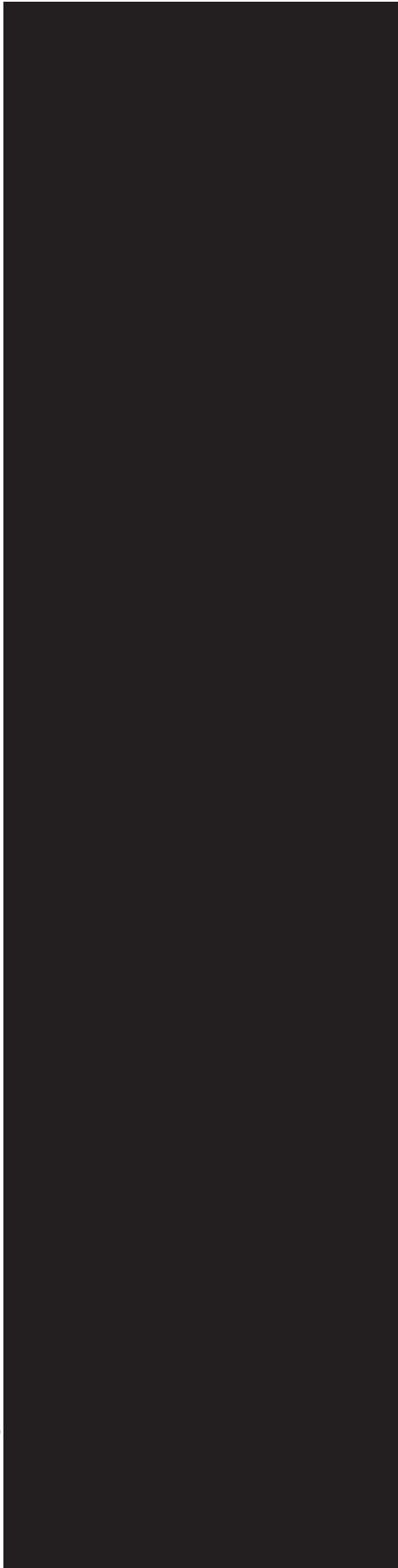
431966  
ATLAS TEL CO  
2017



**REDACTED-FOR PUBLIC INSPECTION**

<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



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**REDACTED-FOR PUBLIC INSPECTION**

(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



**REDACTED-FOR PUBLIC INSPECTION**



(2000) Price Cap Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		July 2013

<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



(2000) Price Cap Carrier Additional Documentation (Continued)

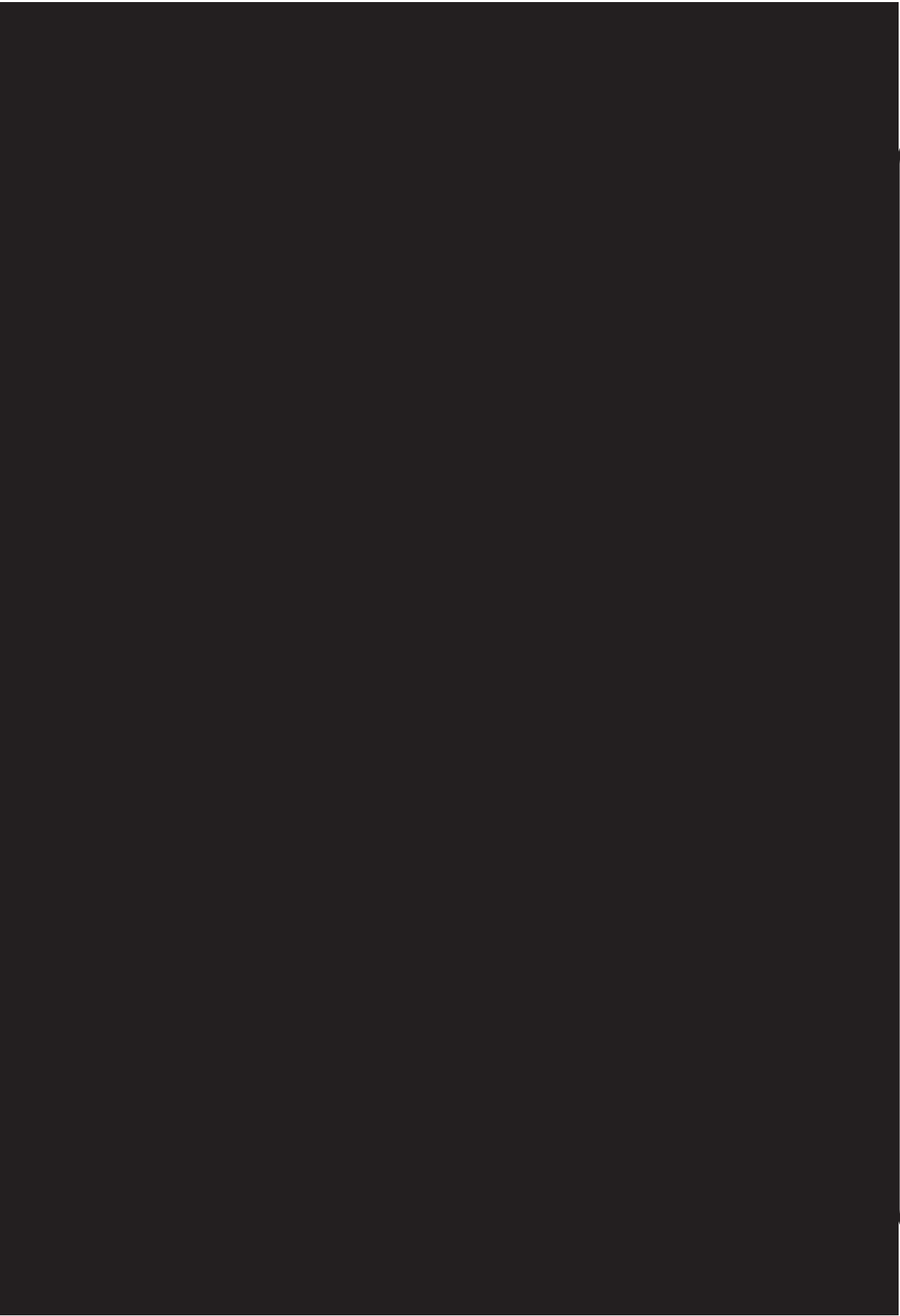
Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013



<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017

**REDACTED-FOR PUBLIC INSPECTION**

(3005) Rate Of Return Carrier Additional Documentation (Continued)

Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



**REDACTED-FOR PUBLIC INSPECTION**



Certification - Reporting Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017



Attachments

***REDACTED-FOR PUBLIC INSPECTION***

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code  
<015> Study Area Name  
<020> Program Year

431966

ATLAS TEL CO

2017



REDACTED-FOR PUBLIC INSPECTION

COMPANY	ATLAS TELEPHONE COMPANY
SAC	431966
YEAR COMPLETED	2016



***REDACTED-FOR PUBLIC INSPECTION***



SAC  
YEAR FILED

431966  
2016



***REDACTED-FOR PUBLIC INSPECTION***

SAC

431966



***REDACTED-FOR PUBLIC INSPECTION***

SAC

431966



***REDACTED-FOR PUBLIC INSPECTION***

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431966



**REDACTED-FOR PUBLIC INSPECTION**







<010>	Study Area Code	431966
<015>	Study Area Name	ATLAS TEL CO
<020>	Program Year	2017

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Atlas Telephone Company

Study Area Code: 431966

Response to Line 510 – Service Quality Standards and Consumer Protection Rules



***REDACTED-FOR PUBLIC INSPECTION***

Atlas Telephone Company

Study Area Code: 431966

Response to Line 610 – Ability to Function in Emergency Situations for Voice and Broadband



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<sup>1</sup> Section 54.202(a)(2)

***REDACTED-FOR PUBLIC INSPECTION***



Atlas Telephone Company

Study Area Code: 431966

Response to Line 1010 – Voice Services Rate Comparability



***REDACTED-FOR PUBLIC INSPECTION***

LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

A. Applicability

1. Lifeline Service is a telecommunications service assistance program designed to provide eligible residential customers with a credit to be applied to the price of basic local exchange service.
2. Eligible customers will receive a credit as set forth in Section IV. Lifeline Credits below, to be applied to their basic local exchange access service.
3. Customers shall not receive more than one Lifeline credit regardless of the number of residential access lines or locations the customer receives service within the State of Oklahoma.
4. All charges, either recurring or nonrecurring, for any service or feature other than Lifeline Service shall be billed at the tariffed rate.
5. Lifeline Service shall not be available on a retroactive basis.

B. Designated Services Available to Lifeline Customers (1)

The following services shall be offered to eligible Lifeline customers:

1. Single Party Service
2. Local Usage
3. Touch Tone Services
4. Voice Grade Access to the Public Switched Network
5. Access to Emergency Services
6. Access to Operator Services
7. Access to Interexchange Services
8. Access to Directory Assistance
9. Availability of Toll Restriction at No Charge (2)

C. Eligibility Requirements

1. Customers or applicants seeking a Lifeline service credit must provide documentation to the Company establishing that the customer or applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.

(1) Lifeline service may not be disconnected for non-payment of toll charges.

(2) Eligible customers accepting toll restriction services shall not be required to pay a deposit.

APPROVED

JAN 01 1998

LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

C. Eligibility Requirements (Continued)

- a. The applicant or customer must meet the requirements for eligibility for either Medicaid, Food Stamps, federal public housing, Low-Income Energy Assistance Program, or Supplemental Security Income. Additionally, persons who are eligible recipients of income assistance for Vocational Rehabilitation (including Aid to the Hearing Impaired) are also eligible for the Lifeline Service credit; or
  - b. Are eligible for or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under programs providing vocational rehabilitation, including aid to the hearing impaired; or
  - c. Are eligible for or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant, pursuant to the Sales Tax Relief Act, section 5011 et seq. of Title 68 of the Oklahoma Statutes.
  - d. For federal income tax purposes, the applicant is not a dependant unless over sixty years of age.
2. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
  3. Upon receipt of the applicant's documentation establishing eligibility as stated above, the Company will begin providing the credit.
  4. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually.
  5. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

APPROVED

LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

D. Lifeline Credits

Monthly Credit (1)

- |    |  |        |
|----|--|--------|
| 1) | federal subscriber line charge credit                    | (2)    |
| 2) | initial federal credit to residential access line        | \$1.75 |
| 3) | initial state credit to residential access line          | \$1.17 |
| 4) | additional federal credit to residential access line (3) | \$0.58 |

- (1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate. In no instance will a subscriber's monthly local exchange rate be less than \$2.50 after application of the Lifeline credits.
- (2) Lifeline Service has been certified by the FCC, therefore, eligible Lifeline customers will receive the appropriate waiver of the Subscriber Line Charge (SLC) as specified by the FCC.
- (3) Half of the amount specified on line 3, not to exceed \$1.75.

APPROVED

DEC 19 2001

DIRECTOR OF  
PUBLIC UTILITIES

Cause No.: PUD 200100619

Order No.: 459157

Effective: 12-19-2001

**REDACTED-FOR PUBLIC INSPECTION**



LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands

AT

1. The applicant or customer seeking to obtain Lifeline Service on Tribal Lands (see definition in 2.a. below) must demonstrate their current participation in at least one of the following assistance programs. The Applicant or customer shall complete and sign, under penalty of perjury, an authorization and self certification form provided by the Company. The Applicant or customer must check all of the following that apply.

- a. Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps)
- b. Temporary Assistance for Needy Families (TANF)
- c. Supplemental Security Income (SSI)
- d. Medical Assistance (Medicaid/Soonercare)
- e. Vocational Rehabilitation (including aid to the hearing impaired)
- f. Oklahoma Sales Tax Relief
- g. Federal Public Housing Assistance
- h. Low Income Home Energy Assistance Program
- i. Food Distribution Program on Indian Reservations ("FDPIR")
- j. 135% of the Federal Poverty Guidelines
- k. Bureau of Indian Affairs general assistance; (1)
- l. Temporary Assistance for Needy Families (TANF) tribally-administered block grant programs; (2)
- m. Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision); or
- n. National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals).

AT

AT  
AT

2. The applicant or customer must also certify:

- a. Residence on Tribal Lands as described in Title 25, Code of Federal Regulations, Section 20.1, paragraph (v).
- b. Agreement to notify Company if applicant or customer no longer participates in the program or programs described in paragraph 1. above, for which the Applicant or Customer certified their participation in.
- c. The applicant must not be a dependent for Federal Income Tax purposes, unless the applicant is over the age of 60.

3. Upon receipt of the completed self certification, Company will begin providing the credit set forth in F. below. Lifeline credits will not be implemented or continued unless telephone service arrangements are and remain within the Lifeline Service criteria specified above.

- (1) Applicant must "have sufficient resources to meet the basic and special needs defined by the Bureau Standard of assistance," 25 C.F.R. § 20.21.
- (2) 42 U.S.C. § 612 and 45 C.F.R. § 286.



LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands (Continued) AT

4. The Lifeline credits will be discontinued upon receipt by the Company of notice by the Customer that they no longer meet the eligibility requirements for the Lifeline credits.
5. The Lifeline credits will be automatically discontinued unless the customer annually certifies they continue to meet the eligibility requirements for Lifeline credits. All such annual re-self certifications must be submitted to the Company within the time frames determined by the Company.
6. Lifeline customers will be converted to standard residential service rates once they no longer qualify for Lifeline Service. No service charge will apply for this change in service.

F. Lifeline Credits on Tribal Lands DT

Lifeline Service on Tribal Lands has been established by the Federal Communications Commission (FCC), therefore eligible Lifeline customers will receive the appropriate credits, depending on the programs the customer participates in, as specified by the FCC in its Twelfth Report and Order entered into in CC Docket No. 96-45 and as set forth below:

1. If a customer indicates eligibility to receive Lifeline credits as, Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps), Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), Medical Assistance, Vocational Rehabilitation (including aid to the hearing impaired), Food Distribution Program on Indian Reservations ("FDPIR") or Oklahoma Sales Tax Relief Act (68 O.S. §5011, et seq.), then the Customer should receive credits as follows:

Monthly Credit<sup>(1)</sup>

Federal Lifeline Credit:	\$9.25	CR
Oklahoma Universal Service Fund Credit:	\$1.17	CR
Additional Federal Credit to Residential Access Line necessary to reduce customer's bill to \$1.00	(See footnote (2) below)	

DT

- (1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate, ~~less \$1.00~~. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.
- (2) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed \$25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

F. Lifeline Credits on Tribal Lands (Continued)

DT

2. If a customer indicates his eligibility to receive Lifeline credits as only one or more of the following: Federal Public Housing Assistance, Low Income Home Energy Assistance Program, Bureau of Indian Affairs general assistance, Temporary Assistance for Needy Families (TANF) tribally administered block grant programs, Head Start Programs (only those meeting its income qualifying eligibility provision), 135% of the Federal Poverty Guidelines or National School Lunch Program (only Applicant or customer who satisfy the income standard of the program for free meals), then the Customer should receive credits as follows:

Monthly Credit <sup>(3)</sup>

Federal Lifeline Credit

\$9.25

CR

Additional Federal Credit to Residential Access Line

Necessary to reduce customer's bill to \$1.00 (See footnote (4) below)

DT

(3) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.

(4) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service not to exceed \$2.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

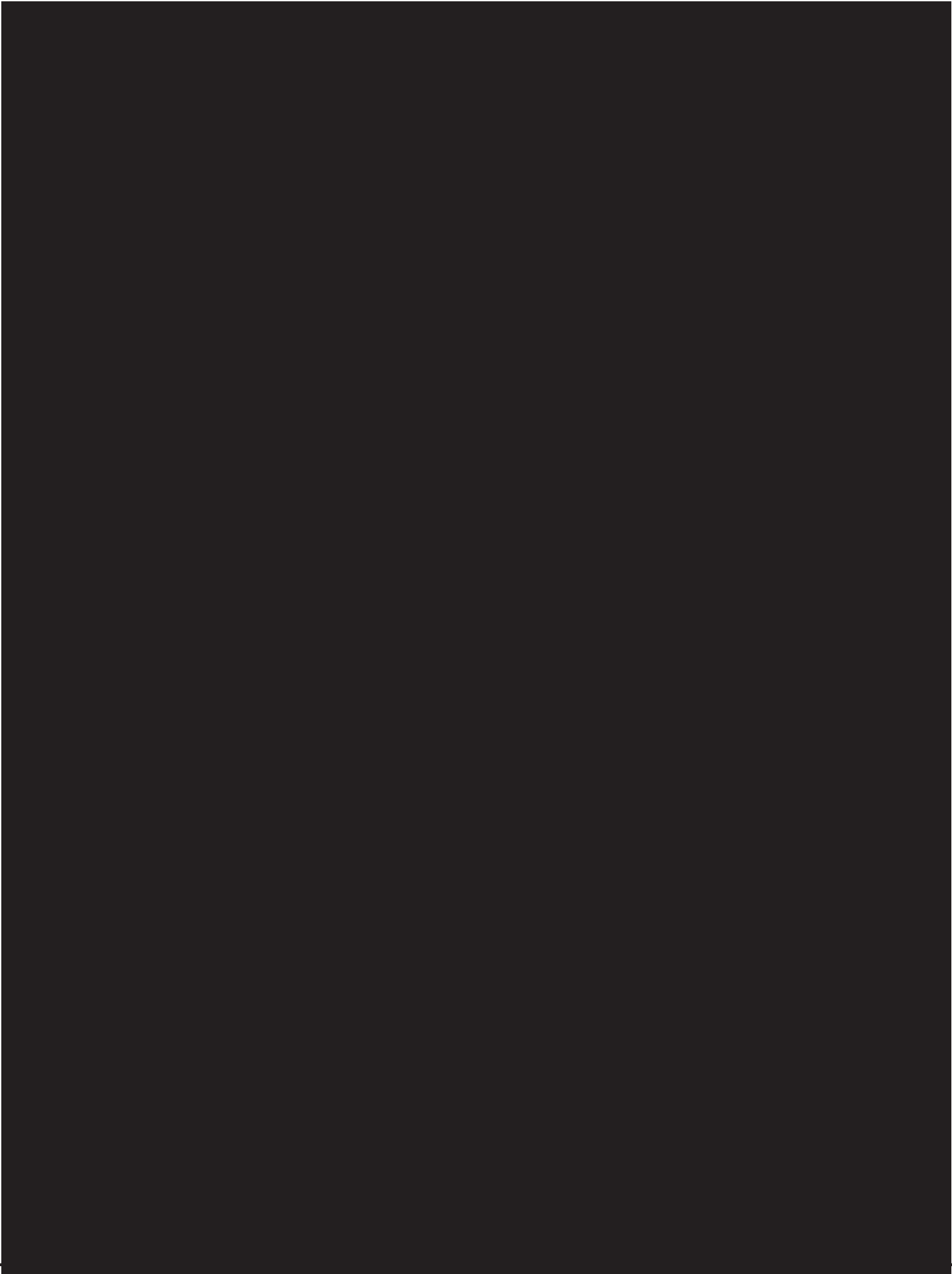
Response to Line 3010B

Atlas Telephone Company

Study Area 431966



***REDACTED-FOR PUBLIC INSPECTION***







***REDACTED-FOR PUBLIC INSPECTION***



***REDACTED-FOR PUBLIC INSPECTION***



***REDACTED-FOR PUBLIC INSPECTION***





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